

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

**In re: Firstbase.io, Inc., Debtor.
Case No. 24-11647 (LGB)**

**STATEMENT OF PEARMILL INC. IN OPPOSITION TO HARBOR COMPLIANCE'S
REQUEST FOR APPROVAL TO FILE A COMBINED DISCLOSURE STATEMENT
AND PLAN**

Pearmill Inc. ("Creditor"), a creditor of the above-captioned debtor, respectfully submits this statement in opposition to the request by Harbor Business Compliance Corporation ("Harbor") to file a combined disclosure statement and chapter 11 plan [Docket No. 170].

Creditor opposes the attempt by Harbor to expedite the approval process in any manner that may impair due process or hinder creditor participation. Expedited consideration would curtail the time necessary for parties in interest to fully review and assess the implications of the proposed plan. A combined and fast-tracked process may obscure material issues that deserve full disclosure, deliberation, and creditor scrutiny. Additionally, no exigent circumstances exist that would justify shortening the procedural safeguards provided under Bankruptcy Rules 2002 and 3017.

For these reasons, Creditor respectfully urges the Court to deny Harbor's request for an expedited approval process and to require Harbor to proceed with its proposed plan and disclosure statement utilizing the standard timelines and procedures set forth in the Bankruptcy Code and Rules.

Dated: 07/28/2025

Respectfully submitted,

DocuSigned by:
/s/ Nima Gardideh
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Nima Gardideh | Co-founder, President, and CTO at Pearmill Inc.

Address: 169 Madison Ave #2020 - New York, NY 10016 US

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

**In re: Firstbase.io, Inc., Debtor.
Case No. 24-11647 (LGB)**

**STATEMENT OF JURIS LOGIC LLC IN OPPOSITION TO HARBOR COMPLIANCE'S
REQUEST FOR APPROVAL TO FILE A COMBINED DISCLOSURE STATEMENT
AND PLAN**

Juris Logic LLC ("Creditor"), a creditor of the above-captioned debtor, respectfully submits this statement in opposition to the request by Harbor Business Compliance Corporation ("Harbor") to file a combined disclosure statement and chapter 11 plan [Docket No. 170].

Creditor opposes the attempt by Harbor to expedite the approval process in any manner that may impair due process or hinder creditor participation. Expedited consideration would curtail the time necessary for parties in interest to fully review and assess the implications of the proposed plan. A combined and fast-tracked process may obscure material issues that deserve full disclosure, deliberation, and creditor scrutiny. Additionally, no exigent circumstances exist that would justify shortening the procedural safeguards provided under Bankruptcy Rules 2002 and 3017.

For these reasons, Creditor respectfully urges the Court to deny Harbor's request for an expedited approval process and to require Harbor to proceed with its proposed plan and disclosure statement utilizing the standard timelines and procedures set forth in the Bankruptcy Code and Rules.

Dated: 07/28/2025

Respectfully submitted,

DocuSigned by:

/s/ Marc Visnick

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Marc Visnick | Owner, Director of Technical Due Diligence | JurisLogic LLC

Address: 25 NW 23rd Place, Suite 6 PMB 169 - Portland, OR 97210

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

**In re: Firstbase.io, Inc., Debtor.
Case No. 24-11647 (LGB)**

**STATEMENT OF LAW OFFICE OF CHRISTINE HANLEY IN OPPOSITION TO
HARBOR COMPLIANCE'S REQUEST FOR APPROVAL TO FILE A COMBINED
DISCLOSURE STATEMENT AND PLAN**

Law Office of Christine Hanley ("Creditor"), a creditor of the above-captioned debtor, respectfully submits this statement in opposition to the request by Harbor Business Compliance Corporation ("Harbor") to file a combined disclosure statement and chapter 11 plan [Docket No. 170].

Creditor opposes the attempt by Harbor to expedite the approval process in any manner that may impair due process or hinder creditor participation. Expedited consideration would curtail the time necessary for parties in interest to fully review and assess the implications of the proposed plan. A combined and fast-tracked process may obscure material issues that deserve full disclosure, deliberation, and creditor scrutiny.

For these reasons, Creditor respectfully urges the Court to deny Harbor's request for an expedited approval process and to require Harbor to proceed with its proposed plan and disclosure statement utilizing the standard timelines and procedures set forth in the Bankruptcy Code and Rules.

Dated: 07/28/2025

Respectfully submitted,

Signed by:

/s/ Christine Hanley

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Christine Hanley

Address: 2041 A NW 60th Street - Seattle, WA 98107